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**JUSTIN LANASA, TSR, LLC, and
DUNGEON HOBBY SHOP MUSEUM, LLC,**

— *versus* —

Defendant.

VERIFIED COMPLAINT

THE PARTIES

2. Plaintiff TSR, LLC (hereinafter referred to as "TSR")
is a limited liability corporation existing under the laws of

1 the State of Wisconsin has an office located in the State of
2 North Carolina. TSR maintains and conducts business from an
3 office in Wilmington, North Carolina.

4 3. Plaintiff DUNGEON HOBBY SHOP MUSEUM, LLC (hereinafter
5 referred to as "DUNGEON HOBBY"), is a limited liability
6 corporation existing under the laws of the State of Wisconsin
7 and operates as a business in the State of Wisconsin.

8 4. Plaintiff LANASA is the principal officer and member
9 of Plaintiff TSR.

10 5. Defendant ERIK STIENE (hereinafter referred to as
11 "STIENE") is a private individual residing at 5209 Haspel
12 Street, # 2, Elmhurst, NY 11373-4344.

13 6. Plaintiff TSR is a limited liability company and a
14 creator, manufacturer, and distributor of tabletop role
15 playing games, as well as other products and services.
16 Plaintiff distributes its products throughout the country and
17 on the internet.

JURISDICTION & VENUE

7. Plaintiffs repeat and re-iterate ¶¶ 1 through 5 inclusive as if set forth herein.

8. Each and all acts of Defendant STIENE were performed individually and collectively, and by his own design and intent.

9. The incidents which give rise to this cause of action occurred within this jurisdiction, the Eastern District of New York, and within one year of the action itself or within one year of the named Plaintiffs having discovered the publication of the alleged defamatory statements.

10. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(1), (2), (c)(2) as amended by Section 311 of the Judicial Improvement Act of 1990, by reason of it being the location where all, or substantially all, of the events or omissions giving rise to the claims occurred, and where the Defendant resides.

11. Jurisdiction is proper pursuant to federal diversity jurisdiction and the amount of damages is in excess of the jurisdictional amount laid out therein, viz., 28 U.S.C. § 1332. Plaintiffs further invoke the pendent and supplemental jurisdiction of this Court to hear and Decide claims arising under state law pursuant to 28 U.S.C. § 1367.

ALLEGATIONS

12. Plaintiffs repeat and re-iterate ¶¶ 1 through 19 as if set forth herein.

13. Defendant maintains an online presence designated as "Tenkar's Tavern".

14. This online presence, designated as "Tenkar's Tavern", is almost solely and exclusively devoted to an obsession with the named Plaintiffs, and includes weekly, if not daily, diatribes, insults, threats, false statements, and profane language directed at the named Plaintiffs, and other postings and re-postings designed to harass, annoy and aggravate the named Plaintiffs, causing them both personal and professional financial and other harm. See, e.g.,

<https://youtu.be/ZJ-sv0LGiuE> Oct 15, 2020

<https://youtu.be/ZDV2b0e0YVk> Oct 15, 2020

<https://youtu.be/ffoo26nEhx8> June 17 2021

<https://youtu.be/MBOYVG-aL54> June 21 2021

https://youtu.be/VJpS_H-M-1I June 22 2021

https://youtu.be/FDbU_nCJnbk June 23 2021

https://youtu.be/t0FwF9_XwtY June 24 2021

<https://youtu.be/1Nr0clsheo0> July 7 2021

<https://youtu.be/qjIi5LGOuFI> July 9 2021

<https://youtu.be/-e2EUHUGbIc> July 29 2021

https://youtu.be/GxY_W55PsaE Aug 19 2021

<https://youtu.be/jjTvNycNpqw> Aug 30 2021

<https://youtu.be/JKwf-tBI1Hg> Sept 6 2021

1 <https://youtu.be/gKYIhMltLnU> Sept 19 2021
2 <https://youtu.be/skGiuemsC2w> Sept 23 2021
3 <https://youtu.be/HjlOxyBhEBY> Oct 21 2021
4 <https://youtu.be/wbDFRQBnclw> Oct 25 2021
5 <https://youtu.be/YWWSA2heW2Y> Oct 28 2021
6 <https://youtu.be/ASOtt4tF4nw> Nov 12 2021
7 <https://youtu.be/cUg9mJLuj-0> Dec 8 2021
8 <https://youtu.be/FbJfO0e09Nc> Dec 9 2021
9 <https://youtu.be/ElWEkQfr7cM> Dec 10 2021
10 https://youtu.be/VBwUlZk_J50 Dec 12 2021
11 <https://youtu.be/Nvlx0T-fsJo> Dec 13 2021
12 <https://youtu.be/FKUptMIAEGw> Dec 26 2021
13 <https://youtu.be/m1qwY5Lb1p8> Jan 3 2022
14 <https://youtu.be/cIcx-rZgSZI> Jan 4, 2022
15 <https://youtu.be/g49lUPQBK58> Jan 7 2021
16 <https://youtu.be/wDl3Wo6WTuU> Jan 8 2022
17 <https://youtu.be/AbpJ-djtNk0> Jan 9 2022
18 <https://youtu.be/0sAMftZTSt0> Jan 14 2022
19 <https://youtu.be/dYlhHRxLyrE> Jan 16 2022
20 <https://youtu.be/UTr6BqwDKRo> Jan 24 2022
21 <https://youtu.be/mvqHZTtyc6o> Jan 31 2022
22 <https://youtu.be/ZJDAatBlR6vc> Feb 8 022
23 <https://youtu.be/p0f2FkH-GZ4> Feb 13 2022
24 <https://youtu.be/diTO55NTyvM> Feb 15, 2022
25 <https://youtu.be/hxsD0lDPkDc> Feb 18, 2022
26 <https://youtu.be/MkUpFrAsseA> Feb 22 2022
27 <https://youtu.be/bYdqbe9KU6o> Feb 24 2022
28 <https://youtu.be/C4Lgw1S1tlo> Feb 26 2022
29 <https://youtu.be/gy2NE7zCAjw> Mar 6 2022
30 <https://youtu.be/ww94qDNy-co> Mar 8 2022

1 <https://youtu.be/yLq9U2ky67g> Mar 10 2022
2 <https://youtu.be/uH9pk2y5NHo> Mar 13 2022
3 <https://youtu.be/1jrrJ8vItWs> Mar 14 2022
4 <https://youtu.be/pSbVzLby37w> Mar 17 2022
5 https://youtu.be/_L381qEwEz4 Mar 21 2022
6 <https://youtu.be/Xk6AyDCmVLk> Mar 24 2022
7 <https://youtu.be/mfgq56eVRPY> Mar 29 2022
8 <https://youtu.be/8PSZGEOXlPs> Apr 4 2022
9 <https://youtu.be/HCJlJ2Apk1A> Apr 5 2022
10 https://youtu.be/mMcvyJb4p_8 Apr 7 2022
11 <https://youtu.be/qv17fb1LzLU> Apr 9 2022
12 <https://youtu.be/Rs-5OU-RpG0> Apr 12 2022
13 <https://youtu.be/U1uDbdxG4VU> Apr 14 2022
14 <https://youtu.be/HKwdLcuJQfw> Apr 19 2022
15 <https://youtu.be/rF53aEDAakY> Apr 28 2022
16 https://youtu.be/bJ_2oqzFtkU Apr 29 2022
17 <https://youtu.be/YtFIiqhJQRA> May 10 2022
18 https://youtu.be/BLn6Zb_UyMs May 15 2022
19 <https://youtu.be/LnYx63faYuY> May 16 2022
20 <https://youtu.be/f4qUp1DVmr8> May 17 2022
21 <https://youtu.be/uqKNEBr9bcg> May 24 2022
22 <https://youtu.be/zugnTqZ0DdM> May 26 2022
23 <https://youtu.be/qkpDy7DJhKw> May 28 2022
24 <https://youtu.be/F8CvlnLQo8> June 7 2022
25 <https://youtu.be/15gffYawjCQ> June 9 2022
26 <https://youtu.be/-sDfkispM9w> June 13 2022
27 <https://youtu.be/djYL3joFZqQ> June 15 2022
28 <https://youtu.be/oZOAWld4XxA> June 16 2022
29 <https://youtu.be/hjOSwJd6ZXM> June 18 2022
30 <https://youtu.be/CbSHvXIB9uI> July 17 2022

1 <https://youtu.be/hzmfCtDKtWw> July 18, 2022
2 <https://youtu.be/fD9evesvAos> July 19 2022
3 <https://youtu.be/FeKYty0JyTg> July 21 2022
4 <https://youtu.be/Anl6NB5KT5o> July 22 2022
5 <https://youtu.be/R5BVOUvgdu0> July 23 2022
6 <https://youtu.be/Ryr70TweDyA> July 24 2022
7 <https://youtu.be/27SxS3K4vDA> July 25 2022
8 <https://youtu.be/JAprZZPC1rQ> Aug 6 2022
9 <https://youtu.be/HttLp32IAp4> Aug 7 2022
10 <https://youtu.be/SUYD3pN0rq4> Aug 11 2022
11 <https://youtu.be/8CslVrln2Mg> Aug 15 2022
12 <https://youtu.be/ec7oiomgJXQ> Aug 16 2022
13 <https://youtu.be/SvtQ2MPNTWM> Aug 18 2022
14 https://youtu.be/hjb1_OACuac Aug 19 2022
15 <https://youtu.be/Mdb-fmzFO7g> Aug 23 2022
16 <https://youtu.be/fSLwjYMnV4E> Aug 29 2022
17 <https://youtu.be/A6B-LmnEedw> Aug 30 2022
18 <https://youtu.be/5Io4oDHbj-E> Aug 30 2022
19 <https://youtu.be/8wpMpCA2N7w> Sept 2 2022
20 <https://youtu.be/GtUjKoQGbeg> Sept 4 2022
21 <https://youtu.be/0Jghe3ECTmI> Sept 5 2022
22 <https://youtu.be/-JeoVMZZ61s> Sept 6 2022
23 <https://www.youtube.com/watch?v=hlih80Xmki0> Sep 16, 2022

24 15. Other than Youtube postings, the named Defendant has
25 utilized multiple other locations on the Internet to distri-
26 bute and publish his defamatory and libelous statements; all
27 demonstrating the malice and intent to harm the named Plain-
28 tiffs. See, e.g.,

1 <https://www.tenkarstavern.com/>
2 <https://www.facebook.com/tenkarstaverncommunity/>
3 <https://www.patreon.com/tenkarstavern>
4 <https://discord.me/tenkars-tavern>
5 <https://twitter.com/tenkarstavern?lang=en>
6 <https://podcasts.apple.com/us/podcast/tavern->
7 [chat/id1386740882](https://podcasts.apple.com/us/podcast/tavern-chat/id1386740882)
8 <https://anchor.fm/tavernchat>

9 16. Through this online presence Defendant, knowingly
10 and willfully, with the intent to harm and cause financial
11 damage to the Plaintiffs, made fraudulent and defamatory
12 statements specifically accusing the named Plaintiffs of
13 various scurrilous and damaging behavior.

14 17. Among, but not limited to, the knowingly, malicious,
15 and intentional and false and defamatory statements, pub-
16 lished online by the Defendant were the following:

17 **January 08, 2022:**

18 "inadvertently honest, I don't think that was your
19 intention" 04:57

20
21 "the new artist got paid for it, but Greg Bell did not"
22 (when, in fact, Artist Greg Bell had been paid for his
23 work) 07:05

24
25 <https://www.youtube.com/watch?v=wDl3Wo6WTuU>
26

27 **January 09, 2022:**

28 Mis-representing the Plaintiff DUNGEON HOBBY

29 "wasn't a not for profit, was for profit" 03:16

1 <https://www.youtube.com/watch?v=AbpJ-djtNk0>

2
3 **February 08, 2022:**

4 Repeated postings on the internet that stated,
5 e.g.,:

6 "does not like homos and their type; will not work
7 with folks that support them" 12:29

8
9 <https://www.youtube.com/watch?v=ZJDAatBlR6vc>

10
11 **February 08, 2022:**

12 "he thinks he's some kind of warrior for the old
13 ways; you know racism, gay bashing, women in the
14 kitchen" 12:29

15
16 <https://www.youtube.com/watch?v=ZJDAatBlR6vc>

17
18 **February 18, 2022:**

19 "jackass comes to my house; I hope they like lead
20 because I have plenty to offer if that is the case"
21 01:51

22
23 <https://www.youtube.com/watch?v=hxsDOLDPkDc>

24
25 **March 17, 2022:**

26 "Mario77, aka ignorant cunt, aka Justin I fuck
27 ignorant cocks; we know this is Justin" 0:28

28
29 accusing Plaintiff LANASA of doxing (search for and
30 publish private or identifying information about (a
31 particular individual) on the internet, typically
32 with malicious intent) the Defendant, with no
33 support whatsoever. 03:08

34
35 "your criminal history; that's certainly public
36 knowledge" 06:10

37
38 "my wife just told you that she would grow a cock
39 so you could eat that cock" 09:31

40
41 <https://www.youtube.com/watch?v=pSbVzLby37w>

42
43 **May 10, 2022:**

44 "TSR . . . they are scraping the bottom of the
45 privy, okay, you can't get more shit than this shit.

1 So that's your customer base and you're appealing
2 to it." 04:10 - 04:22

3
4 <https://www.youtube.com/watch?v=YtFIIqhJQRA>

5
6 **May 28, 2022:**

7 "he himself was kicked out of the military for lack
8 of leadership potential" 15:09

9
10 <https://www.youtube.com/watch?v=qkpDy7DJhKw>

11
12 **June 15, 2022:**

13 "you fucked over your prior business partners to
14 get the TSR trademark" 05:23

15
16 "you included a Nazi in the company" 09:19

17
18 <https://www.youtube.com/watch?v=djYL3joFZqQ>

19
20 18. Further, in an attempt to intimidate, harass, and
21 threaten the named Plaintiff, LANASA, the Defendant posted a
22 video in which he stated: "I already know your address; I
23 already know your fucking phone number; I know your wife's
24 phone number."

25 **March 17, 2022:** <https://www.youtube.com/watch?v=pSbVzLby37w>
26 @ 05:26.

27 19. The Defendant also posted, online, in a continuing
28 attempt to intimidate, harass, and threaten the Plaintiff,
29 images of his wife and minor child. This posting lasted the
30 entire length of the Youtube video, for more than thirteen
31 minutes.

32 **June 18, 2022:** <https://www.youtube.com/watch?v=hjOSwJd6ZXM>

20. In an attempt to resolve this behavior without the necessity of judicial intervention, the Plaintiffs had counsel send a Cease and Desist Letter to the Defendant on July 29, 2022. See Exhibit A.

21. In a further example of the Defendant's rank and tortious behavior, and clear malicious intent to continue to harm the Plaintiffs, the response of the Defendant was to post the letter online, and ridicule it; with no actions taken to comply with the letter.

See <https://www.youtube.com/watch?v=A6B-LmnEedwXX>, Aug. 30, 2022.

22. In further attempts to harass, intimidate, and threaten the named Plaintiffs, the Defendant has made repeated, unsubstantiated, and uncorroborated statements alleging some former position in law enforcement. See, e.g., **September 6, 2021:** <https://www.youtube.com/watch?v=JKWf-tBI1Hg> @ 11:56.

CAUSE OF ACTION FIRST

AS AGAINST DEFENDANT STIENE - DEFAMATION & LIBEL *PER SE*

23. Plaintiffs repeat, re-iterate, and incorporate herein §§ 1 through 22 as if set forth herein.

1 24. The above-stated defamatory and libelous statements
2 described above have had a devastating and irreparable effect
3 on the Plaintiffs personal and professional reputations.

4 25. Furthermore, upon information and belief, said
5 defamatory statements have been repeated and re-posted by
6 third parties causing further and lasting harm to the named
7 Plaintiffs.

8 26. The Defendant either published, or cause to be
9 published, numerous false and defamatory statements about the
10 Plaintiffs.

11 27. Each of these aforesaid defamatory statements were
12 untrue and defamatory in that they falsely reported and
13 mischaracterized the Plaintiffs' character and actions, and
14 the Defendant knew, or should have known, that such statements
15 were false.

16 28. The Defendant published these false and defamatory
17 statements with malice.

18 29. The Defendant published these false and defamatory
19 statements with knowledge of their falsity and/or with a
20 reckless disregard for the truth or falsity of these state-
21 ments.

22 30. Without regard to the falsity and defamatory nature
23 of these statements, among others, the Defendant allowed

1 other parties to re-publish these statements, causing further
2 harm to the Plaintiffs. See, e.g.,

3 <https://youtu.be/KRDUFHbV8N4> (July 20, 2022)

4 <https://youtu.be/AKPn7fM1YwA> (July 20, 2022)

5 <https://youtu.be/wt1HA2O3GYs> (July 20, 2022)

6 <https://youtu.be/ibqG4AlcyNk> (July 25, 2022)

7 <https://youtu.be/rkPURc5cqTU> (July 21, 2022)

8 <https://youtu.be/OUjK132rx-Y> (July 27, 2022)

9 <https://youtu.be/KRDUFHbV8N4> (July 20, 2022)

10 [https://www.tiktok.com/@nightshade_386/video/712263332](https://www.tiktok.com/@nightshade_386/video/7122633321754037550?is_from_webapp=v1&item_id=7122633321754037550)
11 [1754037550?is_from_webapp=v1&item_id=71226333217540375](https://www.tiktok.com/@nightshade_386/video/7122633321754037550?is_from_webapp=v1&item_id=7122633321754037550)
12 [50](https://www.tiktok.com/@nightshade_386/video/7122633321754037550?is_from_webapp=v1&item_id=7122633321754037550)
13

14 31. The Defendant, among other things, as set forth
15 above, accused the Plaintiff LANASA of "he's some kind of
16 warrior for the old ways; you know racism, gay bashing, women
17 in the kitchen"; "you included a Nazi in the company"; "you
18 fucked over your prior business partners to get the TSR
19 trademark". See ¶ 22 above. All of which the Defendant knew
20 to be false.

21 32. The effect of these accusations has been to seriously
22 and irrevocably harm not only Plaintiff LANASA, but also
23 Plaintiffs TSR, and DUNGEON HOBBY.

1 33. These aforesaid statements constitute defamation
2 and/or libel *per se* because they falsely impugn the Plain-
3 tiffs' honesty, trustworthiness, dependability, and profes-
4 sional fitness and abilities, and falsely charged him with
5 engaging in criminal conduct, fraud, dishonesty and/or other
6 conduct that would tend to injure the Plaintiffs in their
7 trade or business, and any trade, business, or profession
8 which Plaintiffs may seek to pursue.

9 34. These aforesaid false and defamatory statements have
10 caused the Plaintiff LANASA (as well as his family members)
11 severe embarrassment, humiliation and emotional injury.

12 35. Upon information and belief, the Defendant has made,
13 and continues to make or cause to be made, these and similarly
14 false and defamatory statements about the Plaintiffs to third
15 parties.

16 36. As a result of said defamation, the Plaintiff LANASA
17 continues to suffer from severe humiliation, loss of standing
18 in the community, loss of self-esteem, public disgrace, loss
19 of standing and respect within his own family, and severe and
20 extreme emotional distress.

21 37. The defamatory acts committed against the Plaintiffs
22 by Defendant were intentional, willful, wanton, malicious and
23 oppressive and were motivated, solely by a desire to

1 permanently harm the name, reputation, and financial and
2 business interests of the Plaintiffs without regard for the
3 truth or the Plaintiffs' well-being and were based on a lack
4 of concern and ill-will toward the Plaintiffs and/or a mali-
5 cious, deliberate, and/or reckless disregard for their
6 rights, for which the Plaintiffs are entitled to an award of
7 punitive damages.

8 38. At all material times, Defendant defamed Plaintiff
9 LANASA by - as stated above - making false statements which
10 tended to expose Plaintiff to public contempt, ridicule,
11 aversion or disgrace, and induced an evil opinion of him in
12 the minds of right-thinking persons, and deprived him (and
13 continues to deprive him) of their friendly intercourse in
14 society.

15 39. The Plaintiff LANASA has suffered harm as a result
16 of the defamatory statements including, but not limited to,
17 reputational harm, emotional distress and mental anguish, and
18 the statements were defamatory and libelous *per se*.

19 40. As a direct and proximate result of the aforesaid
20 actions of the Defendant, inclusive of all the claims herein,
21 the Plaintiff LANASA and his family have been forced to seek
22 therapy and other professional health care assistance.

1 41. As a result of Defendant's conduct, the Plaintiffs
2 are entitled to compensatory and punitive damages, as well as
3 injunctive and Declaratory relief.

4 42. That as a result of the foregoing, Plaintiffs have
5 been damaged in a sum exceeding the jurisdictional limits of
6 all lower courts that would otherwise have jurisdiction over
7 this matter.

8 **CAUSE OF ACTION SECOND**

9 **AS AGAINST DEFENDANT STIENE - SLANDER PER SE**

10 43. Plaintiffs repeat, re-iterate, and incorporate
11 herein ¶¶ 1 through 42 as if set forth herein.

12 44. As set forth above, Defendant, on numerous
13 occasions, with full knowledge that said statements were
14 false and made with malice, did publish to third parties that
15 Plaintiff LANASA, among other things, that Plaintiff LANASA
16 was a "warrior for the old ways; you know racism, gay bashing,
17 women in the kitchen"; and "you included a Nazi in the
18 company". See above.

19 45. These aforesaid statements constitute defamation
20 and/or libel per se because they falsely impugn the Plain-
21 tiffs' honesty, trustworthiness, dependability, and pro-
22 fessional fitness and abilities, and falsely charged him with
23 engaging in criminal conduct, fraud, dishonesty and/or other

1 | conduct that would tend to injure the Plaintiffs in their
2 | trade or business, and any trade, business, or profession
3 | which Plaintiffs may seek to pursue.

4 | 46. These aforesaid false and defamatory statements have
5 | caused the Plaintiff LANASA (as well as his family members)
6 | severe embarrassment, humiliation and emotional injury.

7 | 47. Upon information and belief, the Defendant has made,
8 | and continues to make or cause to be made, these and similarly
9 | false and defamatory statements about the Plaintiffs to third
10 | parties.

11 | 48. As a result of said defamation, the Plaintiff
12 | continues to suffer from severe humiliation, loss of standing
13 | in the community, loss of self-esteem, public disgrace, loss
14 | of standing and respect within his own family, and severe and
15 | extreme emotional distress.

16 | 49. The defamatory acts committed against the Plaintiffs
17 | by Defendant were intentional, willful, wanton, malicious and
18 | oppressive and were motivated, solely by a desire to
19 | permanently harm the name, reputation, and financial and
20 | business interests of the Plaintiffs without regard for the
21 | truth or the Plaintiffs' well-being and were based on a lack
22 | of concern and ill-will toward the Plaintiffs and/or a
23 | malicious, deliberate, and/or reckless disregard for their

1 rights, for which the Plaintiffs are entitled to an award of
2 punitive damages.

3 50. At all material times, Defendant defamed Plaintiff
4 LANASA by — as stated above — making false statements which
5 tended to expose Plaintiffs to public contempt, ridicule,
6 aversion or disgrace, and induced an evil opinion of him in
7 the minds of right-thinking persons, and deprived him (and
8 continues to deprive him) of their friendly intercourse in
9 society.

10 51. The Plaintiff LANASA has suffered harm as a result
11 of the defamatory statements including, but not limited to,
12 reputational harm, emotional distress and mental anguish, and
13 the statements were defamatory and libelous *per se*.

14 52. As a result of Defendant's conduct, the Plaintiffs
15 are entitled to compensatory and punitive damages, as well as
16 injunctive and Declaratory relief.

17 53. That as a result of the foregoing, Plaintiffs have
18 been damaged in a sum exceeding the jurisdictional limits of
19 all lower courts that would otherwise have juris-diction over
20 this matter.

21

1 CAUSE OF ACTION THIRD

2 AS AGAINST DEFENDANT STIENE -

3 INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

4 54. Plaintiff LANASA repeats, re-iterates, and
5 incorporates herein ¶¶ 1 through 53 as if set forth herein.

6 55. Further, in an attempt to intimidate, harass, and
7 threaten the named Plaintiff, LANASA, the Defendant posted a
8 video in which he stated: "I already know your address; I
9 already know your fucking phone number; I know your wife's
10 phone number."

11 **March 17, 2022:** <https://www.youtube.com/watch?v=pSbVzLby37w>
12 @ 05:26.

13 56. The Defendant also posted, online, in a continuing
14 attempt to intimidate, harass, and threaten the Plaintiff,
15 images of his wife and minor child. This posting lasted the
16 entire length of the Youtube video, for more than thirteen
17 minutes.

18 **June 18, 2022:** <https://www.youtube.com/watch?v=hjOSwJd6ZXM>

19 57. The actions, as set forth above, were conducted by
20 the Defendant for the sole and exclusive purpose of causing
21 severe emotional distress; such actions of the Defendant,
22 towards the Plaintiff were, and are, so shocking and
23 outrageous that it exceeds all reasonable bounds of decency.

1 58. The Defendant's conduct toward Plaintiff, in
2 posting not only the images of Plaintiff's spouse and minor
3 female child, combined with threats of violence, and stating
4 the Defendant knew where the Plaintiff resides, was so
5 outrageous and shocking that it exceeded all reasonable
6 bounds of decency as measured by what the average member of
7 the community would tolerate and, secondly, the Defendant's
8 conduct caused severe emotional distress to Plaintiff and,
9 thirdly, that Defendant acted, solely and exclusively with
10 the desire to cause such distress to Plaintiff, intentionally
11 and recklessly and with utter disregard of the consequences
12 that might follow.

13 59. As a result of Defendant's conduct, the Plaintiff is
14 entitled to compensatory and punitive damages, as well as
15 injunctive and Declaratory relief.

16 60. That as a result of the foregoing, Plaintiffs have
17 been damaged in a sum exceeding the jurisdictional limits of
18 all lower courts that would otherwise have juris-diction over
19 this matter.

20 WHEREFORE, Plaintiffs demand judgment against the Defendant,
21 as follows:

- 22 a. On the First Cause of Action, damages in an amount
23 exceeding the jurisdictional limits of all lower

1 courts that would otherwise have jurisdiction over
2 this matter;

3 b. On the Second Cause of Action, damages in an amount
4 exceeding the jurisdictional limits of all lower
5 courts that would otherwise have jurisdiction over
6 this matter;

7 c. On the Third Cause of Action, damages in an amount
8 exceeding the jurisdictional limits of all lower
9 courts that would otherwise have jurisdiction over
10 this matter;

11 d. An Order from this Court permanently enjoining the
12 Defendant from posting anything on any social media
13 platform, private or public, making any statement or
14 reference to the named Plaintiffs herein;

15 e. The issuance of a retraction of all defamatory,
16 libelous and false claims;

17 f. Interest, costs, and disbursements of this action;

18 g. Punitive damages, in an amount to be determined at
19 trial;

20 h. Both Pre-judgment and Post-Judgment Interest at the
21 statutory rate;

22 i. For all legal fees and costs and disbursements of this
23 Action; and

1 j. For such other further relief as this Court shall deem
2 just and proper.

3 **DEMAND FOR JURY TRIAL**

4 Plaintiffs hereby demand a trial by jury on all issues.

5 F.R.Civ.P. Rule 38.

6
7 Dated: September 22, 2022
8 Somers, NY

9 

10 Bernard V. Kleinman, Esq.

11 LAW OFFICE OF

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19

20 To: ERIK STIENE
21 5209 Haspel Street
22 # 2
23 Elmhurst, NY 11373-4344
24
25

VERIFICATION

STATE OF NC)
COUNTY OF New Hanover) S.S.:

I am JUSTIN LANASA, the named Plaintiff herein, and a principal in the named Plaintiffs TSR, LLC, and DUNGEON HOBBY SHOP MUSEUM, LLC:

I have read the foregoing Verified Complaint and know the contents thereof. I know the same is true to my own knowledge, except as to matters based upon information and belief, and to those matters I believe them to be true.


JUSTIN LANASA

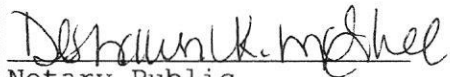

TSR, LLC

By: Justin Lanasa


DUNGEON HOBBY SHOP MUSEUM, LLC

By: Justin Lanasa

Sworn to Before Me
this 22nd day of September 2022


Notary Public
State of North Carolina

